

FEDERAL ELECTION COMMISSION
FIRST GENERAL COUNSEL'S REPORT

MUR 7112

DATE COMPLAINT FILED: July 25, 2016
DATE OF NOTIFICATION: July 27, 2016
DATE OF LAST RESPONSE: August 16, 2016
DATE ACTIVATED: February 15, 2017

STATUTE OF LIMITATIONS: July 11, 2021
ELECTION CYCLE: 2016

COMPLAINANT:

Matthew Stevens

RESPONDENT:

AJ Kern for Congress and John W. Kern in his
official capacity as treasurer

MUR 7115

DATE COMPLAINT FILED: August 2, 2016
DATE OF NOTIFICATION: August 9, 2016
DATE OF LAST RESPONSE: October 3, 2016
DATE ACTIVATED: February 15, 2017

STATUTE OF LIMITATIONS: July 11, 2021
ELECTION CYCLE: 2016

COMPLAINANT:

David FitzSimmons

RESPONDENTS:

AJ Kern for Congress and John W. Kern in his
official capacity as treasurer
John W. Kern
The Boot Shack, Inc.
Kevin Durken

**RELEVANT STATUTES
AND REGULATIONS:**

52 U.S.C. § 30102(i)
52 U.S.C. § 30104(a)(2)
52 U.S.C. § 30104(b)(3)(A)
52 U.S.C. § 30116(a)
52 U.S.C. § 30116(f)
52 U.S.C. § 30118(a)
52 U.S.C. § 30120(a)(1)
52 U.S.C. § 30123
11 C.F.R. § 103.3(b)
11 C.F.R. § 104.3(a)(4)

1 11 C.F.R. § 104.5
2 11 C.F.R. § 104.7(a)
3 11 C.F.R. § 110.4(c)
4 11 C.F.R. § 110.11

5
6 **INTERNAL REPORTS CHECKED:** Disclosure Reports

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8 **FEDERAL AGENCIES CHECKED:** None

9
10 **I. INTRODUCTION**

11
12 The Complaints in these matters make a number of allegations that AJ Kern for Congress
13 and John W. Kern in his official capacity as treasurer (the "Committee"), the authorized
14 committee of Congressional candidate Aliena Jeanene Kern (AJ Kern"), and John Kern in his
15 personal capacity, violated the Federal Election Campaign Act of 1971, as amended, (the "Act").
16 The Complaint in MUR 7112 alleges that the Committee failed to include required best efforts
17 information in online solicitation forms. The Complaint in MUR 7115 alleges that the
18 Committee failed to timely and accurately report its activities and that it received an excessive
19 contribution from John Kern and a prohibited corporate contribution from The Boot Shack, Inc.
20 In response, the Committee presents information showing that it has remedied each of the
21 potential violations stemming from the allegations in the Complaints.¹

22 Because of the Committee's remedial efforts and the *de minimis* amount of the activity at
23 issue, we conclude that none of the allegations merit further use of Commission resources.
24 Accordingly, we recommend that the Commission: (1) dismiss the allegations that the
25 Committee violated 52 U.S.C. § 30104(a)(2) and 11 C.F.R. § 104.5 by untimely filing its 2016
26 April Quarterly Report and Pre-Primary Report; (2) find no reason to believe that John Kern
27 made, and the Committee accepted, excessive contributions in violation of 52 U.S.C. § 30116(a).

¹ Committee Resp. at 1, MUR 7115 (Oct. 5, 2016); Committee Resp. at 2, MUR 7112 (Aug. 17, 2016).

1 and (f); (3) dismiss the allegations that the Committee violated 52 U.S.C. § 30104(b)(3)(A) by
2 failing to accurately report AJ Kern as a contributor; (4) find no reason to believe that John Kern
3 made, and the Committee accepted, excessive cash contributions in violation of 52 U.S.C.
4 § 30123 and 11 C.F.R. § 110.4(c); (5) dismiss the allegation that the Committee, Kevin Durken,
5 and the Boot Shack, Inc. violated 52 U.S.C. § 30118(a) by making or accepting corporate
6 contributions; (6) find no reason to believe that the Committee violated the best efforts
7 provisions of 52 U.S.C. § 30102(i) and 11 C.F.R. § 104.7(a); and (7) dismiss the allegation that
8 the Committee violated 52 U.S.C. § 30120(a)(1) and 11 C.F.R. § 110.11 by failing to include
9 proper disclaimers in its communications. We finally recommend that the Commission send a
10 cautionary letter to the Committee with respect to the allegations for which we recommend
11 dismissal.

12 II. FACTUAL AND LEGAL ANALYSIS

13 AJ Kern was a congressional candidate in Minnesota's 6th Congressional District in the
14 2016 Republican primary election. John Kern is the candidate's husband and also the treasurer
15 of the Committee. During the 2016 election cycle, the Committee raised \$16,031 in
16 contributions and spent \$27,925.² The candidate loaned the Committee \$13,000.³

17 A. Failure to Timely File Reports

18
19 The Complaint in MUR 7115 alleges that the Committee filed its 2016 April Quarterly
20 Report late and failed to file its pre-election report for the August primary.⁴ The Committee
21 admits that it untimely filed its April Quarterly Report on April 19, 2016, but argues that it was

² Amend. 2016 Year-End Report, AJ Kern for Congress (Apr. 11, 2017).

³ *Id.*

⁴ Compl. at 1, 3, MUR 7115. The pre-election report was due on July 28, 2016.

1 due on April 18, 2016 and therefore was only one day late.⁵ The Committee filed its Pre-Primary
2 Report on August 4, 2016 and claims that it was only one day late.⁶

3 In an election year, a principal campaign committee must file quarterly reports on April
4 15, July 15, October 15, and January 31.⁷ In addition, pre-election reports must be filed no later
5 than 12 days before the primary election in which the candidate is running for office.⁸ The
6 Committee filed its 2016 April Quarterly Report four days late and filed its Pre-Primary Report
7 seven days late.⁹ However, because the Committee filed its reports within a few days of the
8 deadline, we recommend that the Commission dismiss the allegations that the Committee
9 violated 52 U.S.C. § 30104(a)(2)(A) and 11 C.F.R. § 104.5(a) as a matter of prosecutorial
10 discretion under *Heckler v. Chaney*¹⁰ but send a letter of caution.

11 **B. Contributions Made by the Candidate**

12 The Complaint in MUR 7115 alleges that the candidate's husband made excessive
13 contributions to the Committee in the form of loans totaling \$10,000.¹¹ In addition, it alleges

⁵ Committee Resp. at 1-2, MUR 7115.

⁶ *Id.* at 1-2. The Commission's Reports Analysis Division ("RAD") notified the Committee of its untimely Pre-Primary Report. See Request for Additional Information at 1, AJ Kern for Congress (Jul. 29, 2016).

⁷ 52 U.S.C. § 30104(a)(2)(A)(iii); 11 C.F.R. § 104.5(a)(1).

⁸ 52 U.S.C. § 30104(a)(2)(A)(i); 11 C.F.R. § 104.5(a)(2).

⁹ The Commission did not impose any administrative fines on the Committee in connection with these reports. Although the Committee filed its April Quarterly Report four days late, the level of activity and the number of days late did not meet the criteria for inclusion in the Commission's Administrative Fines Program. Moreover, the Committee filed its Pre-Primary Report fourteen days late after receiving a Request for Additional Information from the Commission, but the level of activity on the Pre-Primary Report did not meet the criteria for inclusion in the Administrative Fines Program.

¹⁰ 470 U.S. 821 (1985).

¹¹ Compl. at 1-2, MUR 7115. The Complaint also alleges that John Kern improperly contributed an additional \$963 to the Committee. *Id.* These contributions appear to be small contributions made through online portals, such as GoFundMe, or made in cash, none of which would have been reportable. We discuss the cash contributions in *supra* section II.C.

1 that the Committee improperly identified "AJ Kern for Congress" as a contributor for a \$100
2 contribution in its 2016 July Quarterly Report.¹² In response, the Committee contends that the
3 candidate made the contributions.¹³ The Committee has amended the disclosure reports to
4 reflect her as the donor.

5 1. Excessive Contribution

6 The Act provides that no person shall make contributions to any federal candidate and his
7 or her authorized political committee aggregating in excess of a contribution limit indexed for
8 inflation each election cycle,¹⁴ which for the 2016 election cycle was \$2,700 per election.¹⁵ The
9 Act further provides that no candidate or candidate committees shall knowingly accept excessive
10 contributions.¹⁶ Contribution limits also apply to a candidate's family members.¹⁷

11 Nonetheless, federal candidates may themselves make unlimited contributions from their
12 own "personal funds" to their authorized campaign committees.¹⁸ When a candidate uses
13 "personal funds" derived from jointly owned assets, the amount is limited to "the candidate's

¹² *Id.* at 2.

¹³ *Id.*

¹⁴ 52 U.S.C. § 30116(a)(1).

¹⁵ See 52 U.S.C. § 30116(a)(1)(A); Price Index Adjustments for Contribution and Expenditure Limitations and Lobbyist Bundling Disclosure Threshold, 80 Fed. Reg. 5,750, 5,752 (Feb. 3, 2015).

¹⁶ 52 U.S.C. § 30116(f).

¹⁷ See *Buckley v. Valeo*, 424 U.S. 1, 51 n.57 (1976) (upholding the constitutionality of contribution limits as to family members because, "[a]lthough the risk of improper influence is somewhat diminished in the case of large contributions from immediate family members, we cannot say that the danger is sufficiently reduced to bar Congress from subjecting family members to the same limitations as nonfamily contributors").

¹⁸ 11 C.F.R. § 110.10. The Act and Commission regulations provide that "personal funds" are (a) amounts derived from assets that, under applicable State law, *at the time the individual became a candidate*, the candidate had legal right of access to or control over, and to which the candidate had legal and rightful title or an equitable interest; and (b) income received *during the current election cycle*, which includes salary from employment, income from investments, and "gifts of a personal nature that had been customarily received by the candidate prior to the beginning of the election cycle." 52 U.S.C. § 30101(26); 11 C.F.R. § 100.33(a), (b).

1 share of the asset under the instrument of conveyance or ownership;" if the instrument is silent,
2 the Commission will presume that the candidate holds a one-half ownership interest.¹⁹

3 The Committee argues that the Kerns have substantial joint assets and references AJ
4 Kern's House Financial Disclosure Report in support of this.²⁰ According to that Report filed
5 with the House of Representatives on May 16, 2016,²¹ the Candidate reported several assets held
6 jointly with her husband, including a Personal Savings account worth \$250,001-\$500,000.²²
7 Thus, the Candidate appears to possess sufficient personal funds to make the contributions to her
8 Committee.²³ Accordingly, we recommend that the Commission find no reason to believe that
9 John Kern made, and the Committee accepted, excessive contributions in violation of 52 U.S.C.
10 § 30116(a) and (f).

11 2. Reporting of Candidate Contributions

12 The Act requires authorized committees to identify persons, other than a political
13 committee, who make a contribution in excess of \$200 within the election cycle.²⁴ Because the
14 Committee did not accurately disclose AJ Kern as the contributor of the loans described above in
15 the Committee's original reports, the Committee amended those reports, including its 2016 July
16 Quarterly Report, to reflect that AJ Kern, and not John Kern, had made two \$5,000 loans to the

¹⁹ 52 U.S.C. § 30101(26)(C); 11 C.F.R. § 100.33(c).

²⁰ Committee Resp. at 2, MUR 7115.

²¹ Aliena Jeanene Kern, Filing Year 2016 Financial Disclosure Report, Office of the Clerk of the U.S. House of Representatives (May 16, 2016).

²² *Id.*

²³ Committee Resp. at 2, MUR 7115.

²⁴ 52 U.S.C. § 30104(b)(3)(A); 11 C.F.R. § 104.3(a)(4).

1 Committee.²⁵ With respect to the contributions improperly attributed to the Committee, the
2 Committee claims that it made a technical error when recording these contributions in its FecFile
3 software.²⁶ After receiving the Complaint, the Committee states that it properly disclosed the
4 contributions as being made by the candidate.²⁷ Although the Committee failed to accurately
5 report AJ Kern as the contributor, given the *de minimis* amount in violation and the Committee's
6 remedial efforts, we recommend that the Commission dismiss as a matter of prosecutorial
7 discretion the allegations that the Committee violated 52 U.S.C. § 30104(b)(3)(A) but send a
8 letter of caution.²⁸

9 **C. Alleged Cash Contributions**

10 The Complaint in MUR 7115 alleges that John Kern made excessive cash contributions
11 totaling \$576.²⁹ In response, the Committee states that those contributions attributed to John
12 Kern were small contributions ranging from \$3-\$50 that were made by a small group of donors

²⁵ The Complaint also alleges that John Kern improperly contributed \$963 to the Committee, which pertains to the other allegations discussed herein. *See supra* section II.C.

²⁶ Committee Resp. at 2, MUR 7115.

²⁷ *Id.*; Amend. 2016 July Quarterly Report, AJ Kern for Congress (Sept. 25, 2016).

²⁸ 470 U.S. 821 (1985).

²⁹ Compl. at 2, MUR 7115.

1 who were apparently anonymous.³⁰ The Committee amended its reports to remove John Kern as
2 a contributor.³¹

3 The Act prohibits any person from making a cash contribution greater than \$100.³² In
4 addition, Commission regulations provide that a candidate or committee receiving a cash
5 contribution in excess of \$100 must return the amount over \$100 to the contributor.³³ With
6 respect to anonymous cash contributions in excess of \$50, a committee must promptly dispose of
7 the amount that is over \$50.³⁴ Here, John Kern does not appear to have been the contributor for
8 the cash contributions at issue, and the Committee claims that it received no anonymous cash
9 contribution over \$50. We have found no other information to the contrary. Accordingly, we
10 recommend that the Commission find no reason to believe that John Kern and the Committee
11 violated 52 U.S.C. § 30123 and 11 C.F.R. § 110.4(c).³⁵

³⁰ Committee Resp. at 2, MUR 7115. The Committee originally reported receiving several contributions from John Kern noted as either "Cash Contribution" or "GoFundMe Contribution." See 2016 April Quarterly Report, AJ Kern for Congress (Apr. 19, 2016); 2016 July Quarterly Report, AJ Kern for Congress (Jul. 15, 2016). These contributions total \$387. Compl. at 1-2, MUR 7115. They include two GoFundMe contributions totaling \$125, one contribution from John Kern in the amount of \$140, and an additional \$122 contribution(s) from John Kern that was not itemized because he had not yet crossed the \$200 threshold. See *id.*; 2016 April Quarterly Report, AJ Kern for Congress (Apr. 19, 2016); 2016 July Quarterly Report, AJ Kern for Congress (Jul. 15, 2016). Thus, the Complaint alleges that John Kern's total excessive contributions totaled \$10,963. Compl. at 1-2, MUR 7115.

³¹ See Amend. 2016 April Quarterly Report, AJ Kern for Congress (Sept. 25, 2016); Amend. 2016 July Quarterly Report, AJ Kern for Congress (Sept. 25, 2016).

³² 52 U.S.C. § 30123.

³³ 11 C.F.R. § 110.4(c)(2).

³⁴ *Id.* § 110.4(c)(3).

³⁵ To the extent that the Committee erred by attributing the \$576 in contributions to John Kern, we recommend that the Commission dismiss the allegation that the Committee violated 52 U.S.C. § 30104(b)(3)(A) given the *de minimis* amount in violation and the Committee's remedial measures, consistent with our recommendation in *supra* section II.B.

D. Alleged Prohibited Contribution

The Complaint alleges that the Committee received a prohibited corporate contribution in the amount of \$906.25 from The Boot Shack.³⁶ The Committee states that it contacted the corporation after determining that it had deposited a corporate contribution and processed the refund after the primary election.³⁷ The Boot Shack argues that Kevin Durken mistakenly issued a check to the Committee from The Boot Shack's checkbook, rather than his personal checkbook.³⁸

The Act prohibits corporations from contributing to candidates or their authorized committees,³⁹ and candidates and their authorized committees are prohibited from knowingly accepting or receiving such contributions.⁴⁰ Further, no officer of a corporation may consent to a corporate contribution.⁴¹

The record indicates that the Committee contacted The Boot Shack and Durken regarding The Boot Shack's contribution and subsequently refunded the prohibited contribution to The Boot Shack.⁴² Although the refund occurred more than 30 days after the Committee received the

³⁶ Compl. at 3, MUR 7115.

³⁷ Committee Resp. at 3, MUR 7115.

³⁸ The Boot Shack Resp. at 1 (Aug. 22, 2016). The Boot Shack's Response was submitted by Deborah Durken, bookkeeper. Kevin Durken did not submit a separate response.

³⁹ 52 U.S.C. § 30118(a).

⁴⁰ 11 C.F.R. § 114.2(d).

⁴¹ 52 U.S.C. § 30118(a).

⁴² *Id.* at 3; The Boot Shack Resp. at 1; *see also* Amend. 2016 October Quarterly Report, AJ Kern for Congress (Oct. 17, 2016).

1 prohibited contribution,⁴³ the Committee took action to comply with Commission regulations.
2 Given the Committee's remedial measures and the *de minimis* amount in violation, we
3 recommend that the Commission dismiss the allegations that the Committee, Durken, and The
4 Boot Shack violated 52 U.S.C. § 30118(a) as a matter of prosecutorial discretion under *Heckler*
5 *v. Chaney* but send a letter of caution.⁴⁴

6 **E. Failure to Include Required Notices in Solicitations**

7
8 The Complaint in MUR 7112 alleges that the Committee failed to include best efforts
9 information in its online solicitation forms and appears to suggest that the Committee failed to
10 itemize contributions by citing to 11 C.F.R. § 104.3(a)(4).⁴⁵ The Committee utilized a
11 GoFundMe account and used PayPal to process donations through its campaign website but did
12 not include statements regarding the Committee's responsibility to use its best efforts to obtain
13 required information about contributors nor disclaimers that fully complied with the Act and
14 Commission regulations.⁴⁶

15 **1. The Best Efforts Notice**

16 Under the Act's best efforts provision, when a treasurer of a political committee shows
17 that best efforts have been used to obtain, maintain, and submit the information required by the
18 Act, any report submitted by the committee will be considered to be in compliance with the

⁴³ Commission regulations require the treasurer to examine contributions for evidence of illegality. 11 C.F.R. § 103.3(b). If legality of a contribution cannot be determined, the treasurer must refund the contribution within 30 days. 11 C.F.R. § 103.3(b)(5).

⁴⁴ 470 U.S. 821 (1985).

⁴⁵ The Complaint in MUR 7112 also alleges that the Committee violated 26 U.S.C. § 6113. This allegation is not within the Commission's jurisdiction, and therefore, we make no recommendation regarding the alleged activity.

⁴⁶ Compl. at 1, Attach. A-K, MUR 7112.

1 Act.⁴⁷ The Commission has further explained that “the best efforts provision is an affirmative
2 defense that a respondent must establish.”⁴⁸ Thus, while a committee may establish that it has
3 exercised best efforts by including language requesting a contributor’s name, address, occupation
4 and other identifying information in its written solicitations,⁴⁹ a committee’s failure to do so is
5 not a violation where the Committee otherwise complied with the reporting requirements of the
6 Act.

7 In its response, the Committee concedes that it did not include the “best efforts”
8 information on its websites, but states that the treasurer “personally contacted, asked for,
9 obtained and reported the occupation and employer of every donor, from whom we received
10 contributions on our internet portals (Paypal or GoFundMe) and which in aggregate, including
11 other forms of payment, exceeded \$200.”⁵⁰ The Committee also modified its online
12 communications to include best efforts information.

13 As discussed previously in this report, there were a small number of contributors that the
14 Committee inaccurately reported until filing amendments in response to the Complaints.⁵¹
15 Nevertheless, it appears that none of those contributions exceeded \$200, and to the extent that
16 the Complaint in MUR 7112 alleges that the Committee violated the best efforts provision, we

⁴⁷ 52 U.S.C. § 30102(i); *see also* 11 C.F.R. § 104.7(a).

⁴⁸ *See, e.g.*, Factual and Legal Analysis at 5, MUR 7043 (Put Alaska First); *see also* Statement of Policy Regarding Treasurers’ Best Efforts to Obtain, Maintain, and Submit Information as Required by the Federal Election Campaign Act, 72 Fed. Reg. 31,438, 31,440 (June 7, 2007) (“The best efforts standard is an affirmative defense and the burden rests with the political committee and its treasurer to present evidence sufficient to demonstrate that best efforts were made.”).

⁴⁹ *See* 11 C.F.R. § 104.7(b)(1).

⁵⁰ Committee Resp. at 2, MUR 7112. The Committee asserts that it only accepted one contribution that exceeded \$200 through its online portal via PayPal. *Id.* at 1-2.

⁵¹ *See supra* sections II.B and II.C.

1 recommend that the Commission find no reason to believe that the Committee violated 52 U.S.C.
2 § 30102(i) and 11 C.F.R. § 104.7(a).

3 2. Disclaimers

4 In the copies of the Committee's web pages attached to the Complaint in MUR 7112, the
5 Committee did not include disclaimers stating that the Committee both paid for and approved the
6 communications,⁵² and some disclaimers were not set apart in a printed box.⁵³ In responding to
7 the Complaint, the Response included copies of its corrected web pages, containing revised
8 disclaimers that complied with the Commission's regulations.⁵⁴

9 All public communications made by a political committee as well as Internet websites of
10 a political committee must include a disclaimer as set forth in the Act and Commission
11 regulations.⁵⁵ If such communication, including any solicitation, is paid for and authorized by a
12 candidate or an authorized committee, the disclaimer must clearly state that the communication
13 has been paid for by the authorized committee.⁵⁶ In addition, disclaimers in printed materials
14 must be presented in a clear and conspicuous matter and meet specific requirements, such as
15 being of sufficient type size to be clearly readable and being placed in a printed box set apart
16 from the other parts of the communication.⁵⁷

⁵² Compl., Attach. A-I, MUR 7112.

⁵³ *Id.* at Attach. I.

⁵⁴ Committee Resp. at 2, Attach. 1-3, MUR 7112.

⁵⁵ 52 U.S.C. § 30120(a); 11 C.F.R. § 110.11(a)(1).

⁵⁶ 52 U.S.C. § 30120(a)(1); 11 C.F.R. § 110.11(b)(1).

⁵⁷ 11 C.F.R. § 110.11(c)(2).

1 Because the Committee's web pages included some identifying information indicating
2 that it was responsible for the solicitations and the Committee took prompt remedial action,⁵⁸ we
3 recommend that the Commission dismiss the allegation that the Committee violated 52 U.S.C.
4 § 30120(a)(1) and 11 C.F.R. § 110.11 as a matter of prosecutorial discretion and caution the
5 Committee with respect to the disclaimer allegations..⁵⁹

6 **IV. RECOMMENDATIONS**

- 7 1. Dismiss the allegations that AJ Kern for Congress and John W. Kern in his
8 official capacity as treasurer violated 52 U.S.C. § 30104(a)(2)(A) and 11 C.F.R.
9 § 104.5(a) and send a letter of caution;
- 10 2. Find no reason to believe that John W. Kern violated of 52 U.S.C. § 30116(a);
- 11 3. Find no reason to believe that AJ Kern for Congress and John W. Kern in his
12 official capacity as treasurer violated 52 U.S.C. § 30116(f);
- 13 4. Dismiss the allegations that AJ Kern for Congress and John W. Kern in his
14 official capacity as treasurer violated 52 U.S.C. § 30104(b)(3)(A) but send a letter
15 of caution;
- 16 5. Find no reason to believe that John W. Kern made and AJ Kern for Congress and
17 John W. Kern in his official capacity as treasurer in violation of 52 U.S.C.
18 § 30123 and 11 C.F.R. § 110.4(c);
- 19 6. Dismiss the allegation that AJ Kern for Congress and John W. Kern in his official
20 capacity as treasurer, Kevin Durken, and The Boot Shack, Inc. violated 52 U.S.C.
21 § 30118(a) but send a letter of caution;
- 22 7. Find no reason to believe that AJ Kern for Congress and John W. Kern in his
23 official capacity as treasurer violated 52 U.S.C. § 30102(i) and 11 C.F.R.
24 § 104.7(a);
- 25 8. Dismiss the allegation that AJ Kern for Congress and John W. Kern in his official
26 capacity as treasurer violated 52 U.S.C. § 30120(a)(1) and 11 C.F.R. 110.11 but
27 send a letter of caution;
- 28

⁵⁸ See Factual and Legal Analysis at 4, MUR 6782 (Mark Pryor for U.S. Senate; Factual and Legal Analysis at 3, MUR 6835 (Leslie Gooch for Congress).

⁵⁹ *Heckler*, 470 U.S. at 821.

9. Approve the attached Factual and Legal Analyses;
10. Approve the appropriate letters; and
11. Close the file.

Lisa J. Stevenson
Acting General Counsel

6/15/17
Date

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Kathleen M. Guith
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